

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA

ELIZABETH SINES ET AL. : Case No. 3:17-CV-72

Plaintiff : Judge MOON

:

-v-

JASON KESSLER ET AL. :

:

Defendants

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**ANSWER TO PLAINTIFFS FIRST AMENDED COMPLAINT**

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Defendants Jason Kessler, Christopher Cantwell, Robert Ray, Nathan Damigo, Matthew Heimbach, Matthew Parrott, Jeff Schoep, Vanguard America, Identity Evropa, Traditionalist Worker Party, National Socialist Movement, and Nationalist Front (“Answering Defendants”) state their Answer to Plaintiff’s First Amended Complaint as follows:

1. Denied.<sup>1</sup>

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<sup>1</sup> To the extent Nationalist Front (“NF”) took any action at all in Charlottesville it was taken by NF member organizations. In this Answer those would be TWP, NSM, and Vanguard. If any of those organizations

2. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
3. Answering Defendants deny the allegations in the first sentence of this paragraph; are without knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence of this paragraph, and on that basis, deny those allegations except that it is denied any Answering Defendant is a “Klansmen”; are without knowledge or information sufficient to form a belief as to the truth of the allegations in the third and fourth sentences of this paragraph, and on that basis, deny those allegations; admit that Cantwell brought firearms and mace, that Vanguard, NSM, Heimbach, Parrott, and Schoep, brought shields and flagpoles, that Identity Evropa, and Damigo, brought signs and flagpoles, and that Ray brought mace, deny any other allegation in the fifth sentence of this paragraph; are without knowledge or information sufficient to form a belief as to the truth of the allegations in the sixth sentence of this paragraph, and on that basis, deny those allegations, except that Kessler, Cantwell, and Ray admit that persons chanted the listed phrases or something similar on August 11, 2017; and deny the remaining allegations in this paragraph.
4. Answering Defendants admit the allegations in the first sentence of this paragraph is accurate but deny they are in any way legally responsible for said

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makes an admission to an allegation herein it is also admitted by NF. If none of them make an admission it is also denied by NF. In addition, where a particular Answering Defendant makes an admission or denial it is admitted or denied by all based solely on the knowledge of that particular answering defendant and to the limits of said defendants knowledge. Further, the phrase “or ratifying” should be included in each factual denial whether or not fully typed in as it was occasionally omitted due to a word processing error.

violence occurring; deny the second sentence of this paragraph; admit the listed quotes in the remainder of the paragraph are accurate or that something similar was posted to the internet, but deny the remaining allegations in this paragraph.

5. Denied.
6. Denied.
7. Denied.
8. Admitted.
9. Admitted.
10. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
11. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
12. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
13. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
14. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

15. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
16. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
17. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
18. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
19. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
20. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Jason Kessler admits he uses or has used the internet handles listed, was an organizer for Unite the Right, founded Unity and Security for America, contributed to VDare and Daily Caller, was featured on a promotional poster, got in a fight with a man in January 2017 and subsequently pled guilty to a misdemeanor charge resulting therefrom, and was charged with perjury, and has collected petition signatures as alleged.

21. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
22. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Christopher Cantwell admits he resides in New Hampshire, hosts “Radical Agenda” and it’s associated social media, has made the statements listed or something similar, and was charged with felonies as alleged or something similar.
23. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that they admit Mr. Fields has been indicted.
24. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Vanguard America admits the general description given of it in this paragraph is passably accurate, denies that James Fields is or ever has been a member; and admits that Fields wore a Vanguard uniform and carried a Vanguard shield on August 12.
25. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit Anglin is the publisher of the

Daily Stormer and that said publication posted the poster alleged or something similar.

26. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit the fundraising post alleged or something similar was posted.
27. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Robert Ray admits he is a resident of Texas, occasionally writes for Daily Stormer, has occasionally represented Daily Stormer and did so in relation to Unite the Right, is involved with Daily Stormer DFW book clubs both in Dallas and generally, encouraged persons to attend the relevant events on Daily Stormer, attended the rally on both August 11 and 12, denies as factually inaccurate allegations of extremism or wrongful violence, and admits attending certain meetings but denies any wrongful conduct plans to do same.
28. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Nathan Damigo admits he was resident of California, was a member of Identity Evropa, punched the woman called “Moldylocks” in April 2017 in Berkeley and made the statement attributed to him or something similar. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations about

what Richard Spencer did or didn't say, and on that basis, deny those allegations.

29. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit Mosley was a planner of Unite the Right.
30. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Identity Evropa admits the general description given of it in this paragraph is passably accurate with the exception of the allegation and implication of any supremacism.
31. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Matthew Heimbach admits he was a leader of TWP and Traditionalist Youth Network, is familiar with Jeff Schoep and Nationalist Front, made the Hitler statement or something similar, and led TWP on August 12.
32. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Matthew Parrott admits the paragraph is accurate but averts that his status in the TWP described in this paragraph is no longer accurate.

33. Admitted except that Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations regarding the Virginia Code in this paragraph, and on that basis, and deny those allegations and deny as factually inaccurate the allegation that violence engaged in was wrongful or unlawful in last sentence of this paragraph.
34. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
35. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
36. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they deny as factually inaccurate the allegation of unlawful violence.
37. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jeff Schoep admits this paragraph is accurate.
38. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jeff Schoep and NSM admit that,

other than legal conclusions and allegations of violence, the description of NSM in this paragraph is substantially accurate.

39. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, except that Jeff Schoep and Matthew Heimbach admit Nationalist Front was supposed to be a way for disparate pro-white groups to cooperate on individual projects should they choose to do so, and deny as factually inaccurate allegations of wrongful violence or intimidation.
40. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit they are aware of the participation Mr. Invictus in the rally.
41. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
42. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit they are aware of Mr. Peinovich's online business presence and are aware that at least Spencer addressed the crowd at various times on August 11 and 12.
43. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

44. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they deny as factually inaccurate allegations of conspiracy or wrongful violence.

45. Denied.

46. Denied except that Answering Defendants are aware of the “summer of hate” meme on Daily Stormer.

47. Answering defendants deny the allegations in this paragraph except they admit the Lee statue issue was relevant to the decision to rally in Charlottesville.

48. Answering defendants deny the allegations in this paragraph except they admit the Lee statue issue was relevant to the decision to rally in Charlottesville.

49. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler denies as factually inaccurate the allegations of intimidation in this paragraph.

50. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler, Nathan Damigo, Matthew Heimbach, Identity Evropa, Vanguard America, and TWP admit the description of signs carried and chants verbally made, as distinct from what WW2 era Nazi government policy or philosophy was, is substantially accurate.

51. Denied as factually inaccurate except that Jason Kessler admits the statements attributed to him in quotes are substantially accurate.

52. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Damigo and Kessler admit that the quoted statement was made if not by Spencer than by a different speaker.

53. Answering Defendants deny as factually inaccurate the allegations in this paragraph except they admit they are aware that the Daily Stormer published the language indicated.

54. Answering Defendants deny as factually inaccurate the allegations in this paragraph except they admit they are aware that the May event has been referred to as indicated.

55. Answering Defendants deny as factually inaccurate the allegations in this paragraph except they admit Jason Kessler applied for a permit and that lawful event planning began prior to August 2017.

56. Answering Defendants deny as factually inaccurate the allegations in this paragraph except Jason Kessler admits the “Proud Boys” were invited and the statements in quotes are substantially accurate.

57. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits he witnessed the July 2017 and it’s description in this paragraph is substantially accurate.

58. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

59. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits the allegations in this paragraph.

60. Denied as factually inaccurate.

61. Denied as factually inaccurate.

62. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Robert Ray admits the indicated language was published by the daily Stormer.

63. Denied as factually inaccurate except that Answering Defendants admit some lawful event planning did occur.

64. Denied as factually inaccurate.

65. Denied as factually inaccurate.

66. Denied as factually inaccurate.

67. Denied as factually inaccurate.

68. Denied as factually inaccurate.

69. Admitted that the internet is used by Answering Defendants and others to communicate a variety of ideas, denied as factually inaccurate that Answering Defendants used it as specifically alleged in this paragraph.

70. Answering Defendants deny as factually inaccurate the allegation in this paragraph that they used the internet to conspire to commit any wrongful or unlawful acts but admit it was used for lawful event planning. Nathan Damigo

and Identity Evropa deny as factually inaccurate the allegation in the last sentence of this paragraph and deny as factually inaccurate that this was an official Identity Evropa event, however it is admitted that Identity Evropa members participated in lawful political activity on relevant dates.

71. Answering Defendants state that the Discord site and how it works speak for itself.

72. Answering Defendants admit a Charlottesville server was set up on Discord, deny as factually inaccurate the remainder of the allegations in this paragraph, but admit that some lawful event planning did occur on the Discord.

73. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits he was a moderator on relevant Discord channel and that it was invite only and he could view and delete posts in his channel.

74. Denied as factually inaccurate.

75. Answering Defendants deny as factually inaccurate the allegations in this paragraph that any unlawful conspiring or activity was perpetrated by them on the Discord but Jason Kessler and Nathan Damigo admit lawful event planning occurred on the Discord.

76. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that they admit there was more than one channel dedicated to lawful planning of the Rally on Discord.

77. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler, Nathan Damigo, and Vanguard America admit that there were private channels on Discord for Rally planning as to specific groups.

78. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits the indicated persons all participated in or were referenced on Discord.

79. Denied as factually inaccurate except that Jason Kessler admits lawful promotional material was shared on Discord.

80. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits those hashtags were used on Twitter.

81. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Vanguard America admits it had a Discord channel one purpose of which was to communicate with event organizers.

82. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations except that they are aware that the listed group had a Discord server.

83. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, but Jason Kessler admits that not all Discord servers have appeared publicly.

84. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, but Robert Ray admits Daily Stormer used it's website for lawful planning activities.

85. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, but admit they are aware of the Charlottesville statement and aver that the statement speaks for itself.

86. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver that the Daily Stormer speaks for itself.

87. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver that altright.com speaks for itself.

88. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, but Robert Ray admits he appears on the referenced video interview and that said video speaks for itself.

89. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts.

90. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, but TWP admits created or distributed the reference poster and avers that the poster speaks for itself.

91. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, but Robert Ray and Vanguard

admit they created or distributed the referenced poster and aver that the poster speaks for itself.

92. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver that the Daily Stormer and alright.com speak for themselves.
93. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, aver that the referenced publications speak for themselves, but Robert Ray admits he posted the language attributed to him or something similar.
94. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts.
95. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver the poster speaks for itself including as to the identity of its creator and uploader.

96. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver publicly released Discord logs speak for themselves.

97. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver the publicly available chat logs speak for themselves.

98. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph.

99. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph.

100. Answering Defendants admit this document exists and was circulated, deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that the document speaks for itself.

101. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the referenced document speaks for itself.

102. Denied as factually inaccurate.

103. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

104. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

105. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

106. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

107. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

108. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speaks for themselves.

109. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such postings speaks for themselves.

110. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

111. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

112. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself but Jason Kessler admits he posted the indicated language or something similar.

113. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

114. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself but Vanguard admits Mr. Rousseau was a member at relevant times.

115. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself but Vanguard admits Mr. Rousseau was a member at relevant times.

116. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself, but Vanguard admits Mr. Rousseau was a member at relevant times and Mr. Ray admits he made the indicted post or something similar.

117. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

118. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting on Daily Stormer speaks for itself.

119. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph.

120. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

121. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that

any such posting speaks for itself, but Vanguard admits planning for a particular physical appearance of it's members did occur.

122. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself, but Jason Kessler admits to posting the referenced language or something similar.

123. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver the referenced poster speaks for itself.

124. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such internet posting speaks for itself.

125. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself.

126. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the Daily Stormer speaks for itself.

127. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting or recorded communication speaks for itself.

128. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself.

129. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting or podcast speaks for itself.

130. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that any such posting speaks for itself, but Jason Kessler

admits he discussed a possible parking and shuttle plan with Tyrone but denies that plan was actually used.

131. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy the planning, intending, or committing of unlawful acts in this paragraph.

132. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such permits speak for themselves.

133. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

134. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

135. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such posting speaks for itself. Jason Kessler specifically denies the allegations regarding his intent in this paragraph.

136. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such posting speaks for itself.

137. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such voice chat speaks for itself.

138. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts and aver that the claim based on this paragraph has been dismissed.

139. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts and aver that the claim based on this paragraph has been dismissed.

140. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such store signs speak for themselves.

141. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such posting or store signs speak for themselves.

142. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such letters speak for themselves.

143. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, but Jason Kessler, Robert Ray, and Christopher Cantwell admit they

participated in planning and/or were aware of planning and did attend said torchlight march.

144. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph but Jason Kessler admits the march was not publicized generally but specifically denies proper government authority was not told about and fully briefed on said march. It is further admitted Jason Kessler's rally permit was for August 12.

145. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, but Jason Kessler admits there was lawful coordination on Discord and avers the Discord speaks for itself.

146. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver the Daily Stormer speaks for itself.

147. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, aver that Discord call recordings speak for themselves, but Jason Kessler admits he made the statements indicated or something similar.

148. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, but Jason Kessler admits the instruction indicated is substantially accurate.

149. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that Discord postings speak for themselves.

150. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that Discord or internet posts speak for themselves, but Robert Ray admits he made the explanation attributed to him or something similar.

151. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and state the Vice documentary speaks for itself, but Christopher Cantwell admits he does appear in the referenced video.

152. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver the Discord posts speak for themselves.

153. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

154. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

155. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

156. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

157. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and Cantwell, Kessler, and Ray deny they issued any unlawful orders to anybody on August 11 during the torchlight march but admit they heard chanting and barking which was impressively noisy.

158. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler specifically denies they took a circuitous route to annoy UVA students or for any other reason and Cantwell and Ray deny they have any knowledge of why any route was taken.

159. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Cantwell, Kessler, and Ray further deny issuing any unlawful

instructions at any time that evening and further deny they carried radios, or wore earpieces.

160. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Cantwell admits he walked generally on the outside of the column.

161. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

162. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that Kessler, Cantwell, and Ray admit they heard barking.

163. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

164. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

165. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself but admit that Richard Spencer appears in said video.

166. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself and that Discord posts speak for themselves.

167. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

168. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself. Robert Ray admits he made the statement attributed to him or something similar.

169. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself. Robert Ray admits he shouted at counterprotestors and admits he made the statement attributed to him or something similar.

170. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

171. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

172. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video and pictures of this portion of the march and they speak for themselves. Answering defendants further aver that any violence was started by the alleged victims not by the marchers and any Answering Defendant actions thereafter were lawful except that Mr. Cantwell admits he has pled guilty to two misdemeanors in connection with this portion of the march but Mr. Cantwell avers his actions were otherwise lawful.

173. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

174. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

175. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself but admit that Richard Spencer appears in the video.

176. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

177. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such video speaks for itself.

178. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

179. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

180. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

181. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

182. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

183. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that the internet post speaks for itself.

184. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet posts speak for themselves.

185. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet posts speak for themselves.

186. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet posts speak for themselves.

187. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that it is admitted Unite the Right occurred on August 12, 2017.

188. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this event and that it speaks for itself and that statements on the internet or video speak for themselves. Jason Kessler admits he made the statement attributed to him or something similar.

189. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet or video posts speak for themselves.

190. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that Discord posts speak for

themselves. Jason Kessler specifically denies as factually inaccurate the allegation in the last sentence of this paragraph.

191. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that Discord chats speak for themselves.

192. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that Discord logs speak for themselves.

193. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

194. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and Jason Kessler denies there was any intentional failure to follow a plan by the Charlottesville Police for safety of marchers.

195. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is video of this rally and said video speaks for itself and said video fails to verify the alleged statements of Mr. McAuliffe.

196. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of NSM's pre-set location and the video speaks for itself.

197. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Vanguard America admits some members marched as a group to the park. Vanguard admits a non-member, James Fields, marched with them.

198. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph except that it is admitted that persons known to Answering Defendants as league of the South members were present on August 12.

199. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

200. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. TWP admits the description of it's members and activities in this paragraph is substantially accurate.

201. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march that contains the quoted language but further aver that none of them expressed said language and that context given in Plaintiffs complaint is entirely inaccurate based on the video.

202. This paragraph was dismissed and does not require a response. Answering Defendants are without knowledge or information sufficient to form a belief as

to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

203. The plaintiffs allegation that each and every anonymous internet poster is a conspirator was dismissed and does not require a response. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

204. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

205. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

206. Answering Defendants deny that they knowingly worked in concert with persons carrying firearms but admit that such were present. Answering Defendants admit Plaintiff Wispelwey was present and locking arms with his cohorts. Other than as admitted in this paragraph Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and

deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

207. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

208. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants admit that Wispelwey and the others were moved out of the way but aver that this occurred only after a Charlottesville police officer told co-defendant Michael Hill that the police could not do anything about Wispelwey and others blocking the road and so the marchers would have to walk through them. Further, it is denied that any Answering Defendant made the statement to Wispelwey or heard it made.

209. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants further aver that this allegation is not even consistent with statements made by Wispelwey to media.

210. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

211. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Further, it is specifically denied that any Answering defendant spit on or caused to be spit on Plaintiff Romero.

212. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, except Matt Parrott admits he made the statements and published the articles attributed to him.

213. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

214. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that Matt Parrott admits he made the statement attributed to him or something similar.

215. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

216. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

217. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that Robert Ray admits the Daily Stormer published the indicated statements or something similar but he denies the plaintiffs allegation regarding deliberate incitement as factually inaccurate.

218. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph. Vanguard denies the statement indicated was anything but a joke or that it had or could have had any effect at the park or was even noticed by any Vanguard member at the park.

219. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

220. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

221. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts or of “common tactics” in this paragraph.

222. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

223. Admitted.

224. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, except it is admitted that state of emergency was announced by police officers around 11:28 a.m.

225. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, except that Robert Ray admits the Daily Stormer published the indicated comment or something similar.

226. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except it is admitted Jason Kessler directed people to go to McIntire Park, some persons loaded into vans, and that Cantwell and Ray were interviewed. Ray's video interview speaks for itself.

227. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph. Robert Ray admits Daily Stormer published the indicated text or something similar but it is denied this was an incitement to violence.

228. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and further deny the statements alleged are admissions of any unlawful conduct except Mr. Parrott admits he did not leave the park immediately upon being told to do so.

229. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

230. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

231. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph. Jeff Schoep admits his published statements on this event are accurate.

232. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

233. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

234. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

235. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

236. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

237. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits the attached picture is accurate.

238. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits the attached picture is accurate.

239. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

240. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

241. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits the indicated post is accurate.

242. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

243. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

244. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

245. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

246. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

247. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

248. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

249. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

250. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

251. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

252. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

253. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

254. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

255. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

256. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

257. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

258. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

259. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

260. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits retweeting the Richard Spencer tweet.

261. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Robert Ray admits the daily Stormer published the indicated language.

262. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

263. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph or it's footnote.

264. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Robert Ray admits the Daily Stormer published this comment.

265. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

266. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

267. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits he made tweet in question and later withdrew with the alleged explanation or one substantially similar. Robert Ray admits the Daily Stormer published the hacking text alleged.

268. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Matt Heimbach admits making the comments alleged.

269. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Robert Ray admits the Daily Stormer published this comment.

270. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Vanguard America admits their server contained such comments and avers that Mr. Rousseau is no longer a member.

271. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jeff Schoep admits he made the alleged comments.

272. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

273. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Christopher Cantwell admits he made the comments attributed to him.

274. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

275. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

276. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

277. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

278. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. It is admitted that Heather Heyer, Lt. H. Jay Cullen, and Trooper Pilot Berke M.M. Yates died on August 12.

279. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

280. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

281. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

282. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

283. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

284. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

285. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

286. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

287. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

288. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

289. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

290. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

291. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

292. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

293. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

294. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

295. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

296. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits he has applied for a permit for August 2018.

297. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

298. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

299. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

300. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

301. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

302. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits making the indicated comment.

303. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Christopher Cantwell admits he appeared in the Vice video which is the source of the comments attributed to him.

304. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Christopher Cantwell admits he granted an interview to Vice which is the source of the comment attributed to him.

305. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

306. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

307. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits he applied for the alleged permit but denies anything like the first Unite the Right will occur with or without a permit.

308. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

309. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Mr. Cantwell admits the funding pages that are alleged were active at one time.

310. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Mr. Cantwell admits running his show from Albemarle County Jail.

311. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Mr. Damigo admits raising funds as alleged at one time.

312. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. It is admitted the City of Charlottesville's proposed actions regarding the Robert E. Lee statue were relevant to the decision to rally in Charlottesville.

313. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

314. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

315. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Identity Evropa admits McLaren met with Spencer.

316. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

317. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

318. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

319. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

320. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

321. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler avers that while Tyrone offered to help and submitted suggestions neither his assistance nor his plan were ultimately used.

322. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits moderating and organizing lawful activity. He denies the Discord was used to plot or incite illegality.

323. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Mr. Cantwell and Mr. ray admit only that the lawful possession and use of weapons was discussed.

324. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

325. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

326. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Cantwell, Kessler, and Ray admit that some fundraising and other help, all lawful, for rallygoers was attempted.

327. Admitted.

328. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

329. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Cantwell, Kessler, and Ray specifically deny this allegation in each particular except they admit to being at the torch light rally.

330. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Cantwell denies assaulting any peaceful person but admits he pled guilty to two misdemeanors arising from the march.

331. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

332. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Vanguard admits Fields so attended but denies he is or ever was a member.

333. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

334. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

335. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

336. Answering Defendants incorporate herein all previous admissions and denials.

337. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

338. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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341. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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343. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

344. Answering Defendants incorporate herein all previous admissions and denials.

345. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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349. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

350. Answering Defendants incorporate herein all previous admissions and denials.

351. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and all it's subparts.

352. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

353. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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358. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

359. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

360. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

361. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

362. Answering Defendants incorporate herein all previous admissions and denials.

363. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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366. Answering Defendants incorporate herein all previous admissions and denials.

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368. Answering Defendants incorporate herein all previous admissions and denials.

369. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

370. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

#### AFFIRMATIVE DEFENSES

371. Assumption of the Risk: in that Plaintiffs assumed and unreasonably disregarded the risk their actions would result in their own personal injury;

372. Contributory Negligence: in that Plaintiffs actions were partly or wholly the cause of their claimed injuries;

373. Duress: In that Defendants claimed actions were taken in self defense while defendants were being unlawfully assaulted or otherwise mistreated.

374. Illegality: In that Plaintiffs actions were unlawful and Plaintiffs misconduct is itself the proximate cause of their injuries;

375. Anything not specifically and explicitly admitted as true in this answer is denied.

WHEREFORE, having fully answered the Plaintiffs Amended Complaint, Answering Defendants request the Court dismiss this action with prejudice.

Respectfully Submitted,

s/ Elmer Woodard  
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CERTIFICATE OF SERVICE

I hereby certify the above was served via the Court's ECF system on July 23, 2018 upon:

All parties of record. No party is entitled to or has requested service by other means.

s/ **Elmer Woodard**

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E. Woodard (VSB 27734)